

March 3, 2023

Via ECF:

The Honorable Jennifer H. Rearden
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Portal Instruments, Inc. v. LEO Pharma A/S, 1:22-cv-09156-JHR*

Dear Judge Rearden:

Plaintiff Portal Instruments, Inc. (“Portal” or “Plaintiff”) and Defendant LEO Pharma A/S (“LEO” or “Defendant” and, together with Portal, the “Parties”) hereby submit this joint letter to request an extension of time to complete fact discovery and for subsequent deadlines in the above referenced action, as set forth in the table below. This is the first request for an extension of time to complete discovery in this action. The Parties are conferring on the appropriate scope of document discovery and wish to defer the production of documents until they have either reached agreement or had a chance to submit the issue for the Court’s resolution. The Parties also request an extension of the deadline to submit a joint status letter to the court by two weeks, from March 6 to March 20, which will hopefully allow them to reach an agreement about which they can update the Court.

Deadline	Current Date	Proposed Date
Joint status letter	March 6, 2023	March 20, 2023
Meet and confer regarding expert discovery	April 4, 2023	June 4, 2023
Close of fact discovery ¹	May 4, 2023	July 3, 2023

¹ Pursuant to paragraph 8 of the January 3, 2023 Scheduling Order (ECF No. 28), the parties agree to extend the deadline for substantial completion of document production to May 2, 2023, the deadlines for completion of document production and for service of interrogatories and

Joint status letter	May 18, 2023	July 17, 2023
Close of expert discovery	June 19, 2023	August 18, 2023
Pre-motion conference for anticipated dispositive motions	July 12, 2023	September 11, 2023

As this matter was only recently reassigned to Your Honor, there are no pending appearances. The Parties would be pleased to appear before Your Honor for a status conference to discuss the proposed amendment to the Civil Case Management Plan at the Court's convenience.

We thank you for Your Honor's attention to this matter.

Respectfully submitted,

/s/ Matthew Salerno

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requests to admit to May 26, 2023, and the deadline for completion of depositions to July 3, 2023.

² This electronic signature is used with consent in accordance with Rule 8.5(b) of the Court's Electronic Case Filing Rules and Instructions.